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May 16, 2016

Via ECF

UNITED STATES DISTRICT COURT, EDNY Hon. Steven I. Locke, USMJ 290 Federal Plaza Central Islip, NY 11722

Re: Greene v Paramount, et al

EDNY Docket: 14 CV 1044

Dear Honorable Sir:

As you know, our office represents the Plaintiff in the above-referenced matter. Please accept this correspondence as a joint request for the scheduling of a status conference, in response to the Court's Order of May 5, 2016.

The parties have completed documentary discovery and the depositions of Plaintiff and three (3) non-party witnesses listed in Plaintiff's Rule 26 Disclosure. Currently, the depositions of an additional non-party witness from Plaintiff's Rule 26 Disclosure; a non-party witness from Defendant's Rule 26 Disclosure; and an officer/witness of Defendant have been scheduled for the week of May 25, 2016. The parties are in the process of scheduling two (2) remaining officer/witnesses of Defendants and the possibility of other non-party witnesses shortly thereafter.

As a result, the parties feel it would be both prudent and a minimal expenditure of Court resources to schedule a status conference for either June 10, June 16 or June 17, 2016. This will allow the parties to substantially complete discovery in this matter without substantial delay.

Thank you for your time and consideration. Should you have any further questions, concerns or directives for the parties, please feel free to contact the undersigned.

Very truly yours,

s/Aaron M. Goldsmith Stephanie Ovadia

cc:

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